## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
Plaintiff.	) ) )	Case No. 1:22-CR-1520-003-JB
vs.	)	
ASHLEY THOMPSON	)	
Defendant.	)	

## **UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW, Defendant, Ashley Thompson, by and through undersigned counsel, respectfully requests this Honorable Court enter a modified order setting conditions of release and in support thereof states the follows:

- Ms. Thompson is scheduled to graduate from Darrin's place, a treatment facility
  in NM on Saturday, October 12, 2024. Ms. Thompson has been accepted to
  Oxford House Elizabeth, a self-supporting recovery home, in Albuquerque, NM.
- 2. Before going to Darrin's Place the parties discussed the benefits of Ms. Thompson seeking treatment and were in agreement that should an opening become available, it would be in her best interest to receive treatment. In addition, upon graduation, the parties contemplated reviewing her conditions because the Court modified the previously imposed conditions and released her third-party to Darrin's Place.
- 3. On April 12, 2024, the Court entered an order setting conditions of release. The

defense requests that all conditions of release remain unchanged and in effect,

except to modify (third-party to Darrin's place) be changed to release on her own

recognizance. Additionally, she will no longer be living in Espanola but in

Albuquerque at Oxford House Elizabeth.

4. Given the graduation from treatment, the parties are requesting that Ms.

Thompson be released on her own recognizance so that she may reside at Oxford

House Elizabeth, in Albuquerque, NM.

5. JoAnn Griego with US Probation was contacted and does not oppose the relief

requested.

6. Assistant United States Attorney, Timothy Trembley was contacted in regard to

this request and does not oppose the relief requested.

WHEREFORE, Defendant, Ashley Thompson, respectfully requests that the Court enter an order

setting conditions of release to reflect the above and for what further relief the Court deems just

and proper.

Respectfully submitted,

JEDIDIAH J. GLAZENER, ESQ

By: /s/ Jedidiah J. Glazener

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I hereby certify that a true and correct copy of the foregoing pleading sent, via the Court's CM/ECF notification system, to Assistant United States Attorney Timothy Trembley.

/s/ Jedidiah J. Glazener

Jedidiah J. Glazener, Esq.

Attorney for Defendant